## Exhibit 19

to August 22, 2022 Declaration of Nicholas Matuschak

**The New York Times** https://www.nytimes.com/2019/07/23/business/jeffrey-epstein-deutsche-bank.html

## Jeffrey Epstein Moved Money Overseas in Transactions His Bank Flagged to U.S.

By David Enrich and Jo Becker

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As Deutsche Bank officials this year scrambled to extricate themselves from a yearslong relationship with Jeffrey Epstein, the wealthy financier charged this month with sex trafficking, they uncovered suspicious transactions in which Mr. Epstein had moved money out of the United States.

Deutsche Bank reported the transactions to a federal agency in charge of policing financial crimes, according to three people familiar with the bank's internal processes. The report came as the bank started looking for signs that Mr. Epstein was using his financial resources for the purposes of sex trafficking.

Mr. Epstein, who has been accused of operating a sex-trafficking ring involving dozens of victims, some as young as 14, is being held in a Manhattan jail cell after federal prosecutors argued he was a flight risk, citing his vast financial resources. He has a byzantine network of businesses and personal holdings, which include real estate, an island and private planes valued at more than \$500 million. Mr. Epstein's lawyer, Reid Weingarten, did not respond to requests for comment Tuesday afternoon.

Deutsche Bank has been contacted by prosecutors and other government authorities investigating Mr. Epstein. Joerg Eigendorf, a Deutsche Bank spokesman, said the bank was "absolutely committed to cooperating with all relevant authorities."

Deutsche Bank executives are still trying to understand the depth and scope of the bank's relationship with Mr. Epstein, who has been a client of its private-banking division since at least 2013 — years after his conduct became public in a prostitution case involving a teenage girl. Mr. Epstein struck a lenient plea deal that included a non-prosecution agreement from federal authorities, and the case has been held up as a glaring example of how the wealthy and well-connected can evade consequences.

At least one bank dropped Mr. Epstein as a client in the years after his guilty plea. But it wasn't until late last year, after The Miami Herald published an investigation into the earlier sexual abuse allegations, that Deutsche Bank decided to sever ties with him. The process proved more complicated and time-consuming than executives had initially anticipated because Deutsche Bank's private-banking division had opened several dozen accounts for Mr. Epstein and his businesses.

The bank's antiquated technology systems did not help. On a number of occasions, Deutsche Bank executives had thought they had shut down all of Mr. Epstein's accounts, only to learn that there were others that they had not previously been aware of, according to one of the people.

At least as of late spring, there were still transactions taking place in some of Mr. Epstein's Deutsche Bank accounts, the three people said. Executives now believe that they have closed all of Mr. Epstein's accounts.

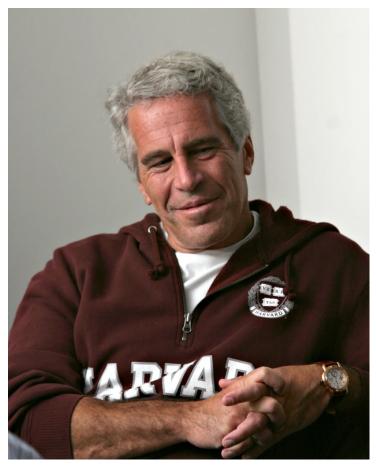
The bank's relationship with Mr. Epstein has been another black eye for Deutsche Bank, which is laying off thousands of employees as it struggles to return to profitability. The bank has been dogged by repeated financial scandals. It is under federal criminal investigation for potential money laundering, an investigation that has raised questions about Deutsche Bank's handling of suspicious activity reports.

Two congressional committees and state prosecutors in New York have also opened investigations into the bank's relationship with President Trump, who received a total of more than \$2 billion in loans from Deutsche Bank over nearly two decades, even as other major banks refused to do business with him.

Mr. Epstein appears to have moved his business to Deutsche Bank after JP Morgan Chase cut ties with him. He had been a client of JPMorgan's private-banking division from the late 1990s until around 2013, five years after he had pleaded guilty to state prostitution charges.

In addition to wealth-management accounts, Deutsche Bank also provided loans to Mr. Epstein and his businesses, according to three people familiar with the relationship.

That relationship has been cause for concern within the bank even before the heightened scrutiny brought by The Herald's reporting.



Deutsche Bank executives are still trying to understand the depth and scope of the bank's relationship with Mr. Epstein. Rick Friedman/Getty Images

In 2015 and 2016, anti-money laundering compliance officers in Deutsche Bank's offices in New York and Jacksonville, Fla., raised a variety of concerns about the work the bank was doing with Mr. Epstein. The employees were concerned that the bank's reputation could be harmed if it became public that Mr. Epstein was a client, according to the three people familiar with the relationship.

In addition, the compliance officers on at least one occasion noticed potentially illegal activity in one of Mr. Epstein's accounts, including transactions in which money was moving outside the United States, two of the people said. The compliance officers produced a so-called suspicious activity report, but it is unclear whether the report was ever filed with the Treasury Department's financial-crimes division.

Despite the compliance officers' misgivings, the bank continued to do extensive business with Mr. Epstein.

Earlier this year, as the bank rushed to disentangle itself from him, officials discovered additional transactions that they saw as problematic, three people said. That prompted the bank to submit a suspicious activity report to the Treasury Department.

The nature of the bank's concerns about the 2019 transactions was not clear. Just because a bank files a suspicious activity report does not mean the transaction was actually improper: Banks sometimes err on the side of over-reporting troubling transactions to avoid government criticism that they missed red flags.

The report was filed with the government as Deutsche Bank conducted an internal investigation into its relationship with Mr. Epstein. Deutsche Bank officials are still trying to determine what Mr. Epstein was using his accounts for, including where and to whom he had previously moved money.

"We're still trying to get our arms around it," one of the people said.

A version of this article appears in print on , Section B, Page 1 of the New York edition with the headline: Bank Flagged Transactions By Epstein